

# **EXHIBIT A**

## Carbone, Elizabeth A

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**Subject:** FW: SBL293045 <https://protect-us.mimecast.com/s/K7GjC2kgm7cZE7oWF2L2-Z>

-----Original Message-----

From: Peter Brooks  
Sent: Monday, May 09, 2016 12:07 PM  
To: Tom Buckley; Matt Barbieri  
Subject: FW: SBL293045 [12.35.251.64/27](https://12.35.251.64/27)

We addressed the unsolicited bulk email. They won't accept it or acknowledge it as it doesn't matter since we are still a list vendor selling emails. Asya is not going to give me another person to talk to.

I don't have a next step yet. I've been reading the Spamhaus website and other posts to come up with another suggestion.

Peter

-----Original Message-----

From: The Spamhaus Project - SBL Removals [<mailto:sbl-removals@spamhaus.org>]  
Sent: Sunday, May 08, 2016 10:58 PM  
To: Peter Brooks <[pbrooks@redidata.com](mailto:pbrooks@redidata.com)>  
Cc: [abuse@att.net](mailto:abuse@att.net); [abuse@sbc.com](mailto:abuse@sbc.com); [abuse@attglobal.net](mailto:abuse@attglobal.net)  
Subject: Re: SBL293045 [12.35.251.64/27](https://12.35.251.64/27)

Hello, Peter,

I've told you what needs to be done to resolve the issue in your favor.  
You have to stop sending unsolicited bulk email, and stop selling lists.  
Those are both non-negotiable. Talking with another team member won't get you a different answer. (They are reviewing these emails in any event; [sbl-removals@spamhaus.org](mailto:sbl-removals@spamhaus.org) is monitored by multiple people.)

I haven't stressed the solution because it was apparent that you do not view your business activities as spam. That puts us in fundamental disagreement. I don't see a way around this.

Thanks,

Asya

On 5/8/2016 7:04 PM, Peter Brooks wrote:

> Is there another person in the company we can talk to?  
>  
> It's clear you personally see us as a SPAMMER and unwilling to provide us details on how we can resolve this. You are not allowing us as a company to explain the marketing issue we had and how we resolved it. If your intent in stopping spam, why are unwilling to work with companies like ours that made a mistake and willing to fix it?  
>  
> We would like to talk to somebody that is willing to listen and if appropriate resolve the issue.

>  
> Peter  
>  
> -----Original Message-----  
> From: The Spamhaus Project - SBL Removals  
> [\[mailto:sbl-removals@spamhaus.org\]](mailto:sbl-removals@spamhaus.org)  
> Sent: Friday, May 06, 2016 4:47 PM  
> To: Peter Brooks <[pbrooks@redidata.com](mailto:pbrooks@redidata.com)>  
> Subject: Re: SBL293045 [12.35.251.64/27](https://www.spamhaus.org/ips/12.35.251.64/27)  
>  
> Hello,  
>  
> We routinely list IPs that host websites that are advertised in spam or that advertise spam support services. When we are certain that an entity is a spammer, we also usually list all IPs assigned to that entity.  
>  
>  
> Thanks,  
>  
>  
> Asya  
>  
>  
> On 5/6/2016 12:23 PM, Peter Brooks wrote:  
>> Asya,  
>>  
>> We are noticing you are not only listing the email IP which had the issue we are trying to resolve with you, but you are also listing web servers which have no email functionality. These seems to be a bit much for a company that admitted to sending to a poor list for internal marketing and has reached out to you to have the issue resolved.  
>>  
>> What is your position at Spamhaus? Can you please provide contact details for your boss that we can talk to?  
>>  
>> We are not trying to hide we sent to a poor list and take that issue seriously. We are looking to show you that this has been resolved. I know many companies have made similar mistakes and were able to take steps to resolve the issue and is what we are looking forward to achieve with you.  
>>  
>> Peter  
>>  
>> -----Original Message-----  
>> From: The Spamhaus Project - SBL Removals  
>> [\[mailto:sbl-removals@spamhaus.org\]](mailto:sbl-removals@spamhaus.org)  
>> Sent: Friday, May 06, 2016 10:20 AM  
>> To: Peter Brooks <[pbrooks@redidata.com](mailto:pbrooks@redidata.com)>  
>> Subject: Re: SBL293045 [12.35.251.64/27](https://www.spamhaus.org/ips/12.35.251.64/27)  
>>  
>> Hello, Peter,  
>>  
>> The legality, or lack thereof, in your collection of email addresses is not relevant here. Spamhaus is not the police in any country. We're a service that warns people about entities that spam or provide services to senders of unsolicited bulk email (spam), so that they can block that email, whether it is legal to send that email or not in a particular jurisdiction.  
>>  
>> You do both. So your IP is listed.

>>  
>>  
>> Thanks,  
>>  
>>  
>> Asya  
>>  
>>  
>> On 5/5/2016 12:49 PM, Peter Brooks wrote:  
>>> Dear Asya,  
>>>  
>>> We license postal and email data legally. Our company does not supply spam services or emails to others that would be spammers!!! The email which is involved in this ticket was not related to our lists or services but an internal marketing email which went to a list not correctly vetted and confirmed. Actions are being taken to resolve this but should not be considered reflective of the services we offer as a company.  
>>>  
>>> We have also taken steps to resolve the unsolicited bulk email issue you raised. I'm sure you have noticed a change in our traffic. What do you need from us to show we have resolved this issue? I expect this is something we can resolve with your help and direction.  
>>>  
>>> We look forward to and appreciate your input and assistance.  
>>>  
>>> Kind Regards  
>>> Peter  
>>>  
>>> -----Original Message-----  
>>> From: The Spamhaus Project - SBL Removals  
>>> [\[mailto:sbl-removals@spamhaus.org\]](mailto:sbl-removals@spamhaus.org)  
>>> Sent: Thursday, May 05, 2016 2:39 AM  
>>> To: Peter Brooks <[pbrooks@redidata.com](mailto:pbrooks@redidata.com)>  
>>> Cc: [abuse@att.net](mailto:abuse@att.net); [abuse@sbc.com](mailto:abuse@sbc.com); [abuse@attglobal.net](mailto:abuse@attglobal.net)  
>>> Subject: Re: SBL293045 [12.35.251.64/27](https://sbl.spamhaus.org/12.35.251.64/27)  
>>>  
>>> Hello,  
>>>  
>>> In addition to sending unsolicited bulk email (spam), your company offers lists for sale. Spamhaus considers the sales of databases or lists containing email addresses to be a spam support service. We cannot remove this SBL listing as long as your company either spam s or provides this or other spam support services.  
>>>  
>>>  
>>> Thanks,  
>>>  
>>>  
>>> Asya  
>>>  
>>>  
>>> On 5/4/2016 6:33 PM, Peter Brooks wrote:  
>>>> I'm writing to ask for details on what we need to provide to  
>>>> resolve this listing. Redi-Data is a valid company selling many services.  
>>>> We want to resolve this issue with you and want to get delisted so  
>>>> if you are able to provide us step details to resolve it that would be good.  
>>>>

>>>  
>>>  
>>> Thanks.  
>>>  
>>> Peter  
>>>  
>>>  
>>>  
>>> Peter Brooks  
>>>  
>>> Director of Data Services and Web Applications  
>>>  
>>> Redi-Data  
>>>  
>>> 5 Audrey Place  
>>>  
>>> Fairfield, NJ 07004  
>>>  
>>> Phone: 973-461-4800  
>>>  
>>> Mobile:862-881-2108  
>>>  
>>> [pbrooks@redidata.com](mailto:pbrooks@redidata.com)  
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>> SBL Removals <[sbl-removals@spamhaus.org](mailto:sbl-removals@spamhaus.org)>  
>> The Spamhaus Project <http://www.spamhaus.org>  
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>> SBL Removals <[sbl-removals@spamhaus.org](mailto:sbl-removals@spamhaus.org)>  
>> The Spamhaus Project <http://www.spamhaus.org>  
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> The Spamhaus Project <http://www.spamhaus.org>  
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The Spamhaus Project <http://www.spamhaus.org>